

January 6, 2021

VIA ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: Docket 5088 – 2021 Renewable Energy Growth Program Tariff and Rule Changes Responses to PUC Data Requests – Set 1

Dear Ms. Massaro:

On behalf of National Grid,¹ enclosed please find an electronic version² of the Company's response to PUC 1-18 in the first set of data requests issued by the Rhode Island Public Utilities Commission in the above-referenced docket.

Thank you for your attention to this matter. If you have any questions, please contact me at 781-907-2126.

Very truly yours,



Laura C. Bickel

Enclosures

cc: Docket 5088 Service List
Leo Wold, Esq.
Jon Hagopian, Esq.
John Bell, Division

¹ The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

² Pursuant to the Rhode Island Public Utilities Commission's guidance concerning the COVID-19 emergency period, National Grid is submitting an electronic version of this filing followed by an original and five hard copies filed with the Clerk within 24 hours of the electronic filing.

Docket No. 5088– Renewable Energy Growth Program for Year 2021
National Grid & RI Distributed Generation Board
Service List updated 1/4/2021

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The Narragansett Electric Company d/b/a National Grid
RIPUC Docket No. 5088
In RE: 2021 Renewable Energy Growth Program Classes, Ceiling Prices,
and Capacity Targets and 2021 Renewable Energy Growth Program –
Tariffs and Solicitation and Enrollment Process Rules
Responses to Commission’s First Set of Data Requests
Issued on December 3, 2020

PUC 1-18

Request:

Bill Credit Recipient: a Customer, as defined below, who is eligible to receive Bill Credits from a Community Remote Distributed Generation System, a Shared Solar Facility, or Standard DG Project pursuant to the eligibility rules in Section 8., or a person or entity that is a customer of record and receiving Residential retail delivery service pursuant to one of the Company’s residential retail delivery service rate schedules, who is eligible to receive credits from a Community Remote Distributed Generation System or a Shared Solar Facility. The Bill Credit Recipient must be in good standing on its electric service accounts with the Company and on any applicable electric service, payment plans or agreements, including but not limited to meeting all obligations under an interconnection service agreement. Bill Credit Recipients shall receive Bill Credits from a single DG Project.

- a. Please provide a definition of “customer in good standing.”
- b. When does a customer fall out of “good standing”?
- c. Over the period January 2018 through December 2019, what was the average number of A-60 customers?
- d. Of that average, what percentage remained in good standing for an entire year?
- e. Of that average, what percentage fell out of good standing between November 1, and April 15 of each of the two years?
- f. Why does a customer need to be in good standing to be a Bill Credit Recipient?
- g. What is the administrative cost to the Company associated with the quarterly change to Bill Credit Recipients for CRDG projects?
- h. What happens now if a Bill Credit Recipient falls out of good standing during a quarter? When is the Bill Credit Recipient removed from receiving CRDG credits? How is a project notified that credits are not being allocated?

Response:

- a. A customer is in “good standing” if their account does not have any amounts owed to The Narragansett Electric Company d/b/a National Grid (the Company) that are in arrears 60 days or more or has agreed to a payment plan on which the customer is current.

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- b. If a customer has billed amounts that are 60 days or more in arrears, or has failed to maintain a payment plan, they would be considered out of “good standing.”
- c. The average number of Rate A-60 customers from January 2018 to December 2019 was 32,612.
- d. The Company’s billing system tracks real-time data and does not easily assess how many individual customers maintained their accounts in “good standing” for an entire 12-month period. Just as the number of Rate A-60 accounts billed each month varies, the number and specific accounts that were in arrears in any month also changed. The Company tracks arrearages through monthly reports and can answer this question based on averages of account status over the periods in question. For 2018 and 2019, an average of 56 percent of accounts were not in arrears using the average number of accounts for both years. Please see Attachment PUC 1-18 for the monthly, annual, and multi-period averages.
- e. Following the explanation in the response to subpart d. above, the percent of Rate A-60 customers over 2018 and 2019 that were in arrears over the period November 1 to April 30 (as data is tracked monthly) was 44 percent. The individual years had different arrearage averages (46.4 percent for 2018 and 41.6 percent for 2019) based on their respective average number of Rate A-60 customers. Please see Attachment PUC 1-18 for the monthly and annual averages.
- f. A customer is required to be in good standing to be enrolled as a Bill Credit Recipient as a matter of fairness to all other customers who pay the incremental costs of the Renewable Energy (RE) Growth Program via the RE Growth Factor. In order to receive the benefits of the RE Growth Program in the form of bill credits, the Company requires potential recipients to be in good standing, which means either maintaining one’s account with amounts less than 60 days due or entering and maintaining a payment plan. The bill credits can then be applied to current and future charges.
- g. On average, it takes half-hour to one hour for the Company’s Accounts Maintenance and Operations group to review and set up customer Bill Credit Recipients from a completed Payment/Credit Transfer form and associated worksheet submitted by a Community Remote Distributed Generation (CRDG) facility owner. To date, only two CRDG facilities are in operation and, as a result, any quarterly changes in Bill Credit Recipient enrollments have created a *de minimis* cost.

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- h. The Company has established a process to review a report on Bill Credit Recipient accounts once per quarter to determine if any are not in good standing. The Company has not yet conducted this review of CRDG bill credit recipients for the two operating CRDG facilities.

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Attachment PUC 1-18

A-60 Account Analysis - NARRAGANSETT ELECTRIC

	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18		Averages
A-60 Accounts Billed	28,613	29,540	29,642	31,455	32,815	31,297	34,394	33,683	33,680	32,999	31,955	30,613	All months	31,724
60+ Accnts (Active)	14,702	15,298	15,485	15,377	14,339	14,830	14,310	13,796	14,159	14,416	13,653	13,862	All months	14,519
													Nov-April	14,730
% A-60 Arrears	51.4%	51.8%	52.2%	48.9%	43.7%	47.4%	41.6%	41.0%	42.0%	43.7%	42.7%	45.3%	Nov-April %	46.4%
	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19		
A-60 Accounts Billed	31,103	32,990	34,099	33,890	34,834	35,503	33,941	34,476	33,482	33,647	32,833	31,110	All months	33,492
60+ Accnts (Active)	14,358	14,426	14,145	14,512	13,528	12,908	12,370	11,876	11,814	13,080	13,291	12,931	All months	13,270
													Nov-April	13,944
% A-60 Arrears	46.2%	43.7%	41.5%	42.8%	38.8%	36.4%	36.4%	34.4%	35.3%	38.9%	40.5%	41.6%	Nov-April %	41.6%
													A-60 Arrears 2018-2019 %	44.0%